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October 3, 2011

VIA ECF

The Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

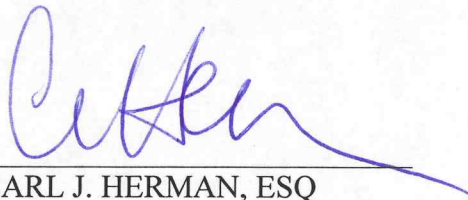
Re: United States v. Thomas Gioeli
Case No.: 08-cr-240

Dear Judge Cogan:

I along with Adam D. Perlmutter are counsel for defendant Thomas Gioeli in connection with the above matter. I am writing to respectfully request an extension of time of 14 days, to October 17, 2011 in which to file a response to government motion 1259. This request is made on behalf of codefendant Dino Saracino and with the consent of the government. The reason for this request is that the defense needs to undertake a more thorough review of the disclosed 3500 material prior to formulating its response.

Thank you for your attention to this request.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'CJH', with a long horizontal flourish extending to the right.

CARL J. HERMAN, ESQ

CJH/sml

cc: All counsel (via ECF)
Thomas Gioeli